# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

15-CR-6053 G

-vs-

MAY 2 7 2015

MAY 2 7 2015

MESTERN DISTRICT OF NY

INFORMATION

(Felony)

Violation:

18 U.S.C. § 1594(c)

JACOB SHAMP,

Defendant.

#### **COUNT 1**

#### The United States Attorney Charges That:

Between on or about January 1, 2015, and on or about January 14, 2015, in the Western District of New York, and elsewhere, the defendant, JACOB SHAMP, did knowingly, willfully and unlawfully combine, conspire and agree with Ashlee Cook to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate and foreign commerce, Victim 1, a person under the age of 18, knowing and in reckless disregard of the fact that Victim 1 had not attained the age of 18 years and that Victim 1 would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Section 1591(a)(1).

All in violation of Title 18, United States Code, Section 1594(c).

### **FORFEITURE ALLEGATION**

## The United States Attorney Alleges That:

Upon the defendant's conviction on Count 1 of this Information, the defendant, JACOB SHAMP, shall forfeit to the United States any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to the following:

1. One LG Cellular Phone Model LS620 with serial number 411CYXM0574690.

All pursuant to Title 18, United States Code, Sections 1594(d) and 1594(e).

DATED: Rochester, New York, May 2015.

WILLIAM J. HOCHUL, JR. United States Attorney Western District of New York

BY:

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